

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

League of United Latin American Citizens –
Richmond Region Council 4614, et al.,

Plaintiffs,

V.

Civil Action No. 1:18-cv-00423-LO-IDD

PUBLIC INTEREST LEGAL
FOUNDATION, an Indiana Corporation,
and J. CHRISTIAN ADAMS,

Defendants.

**PLAINTIFFS' MOTION TO RE-OPEN THE DEPOSITION
OF DEFENDANT J. CHRISTIAN ADAMS**

Plaintiffs, by and through their undersigned counsel, respectfully make this motion pursuant to Federal Rule of Civil Procedure 30(a)(2)(A)(ii) to re-open the deposition of Defendant J. Christian Adams in light of the recent disclosure of material documents and information that were previously withheld by Defendant Adams and closely related third parties.

For the reasons stated in Plaintiffs' supporting memorandum, and accompanying Declaration of Genevieve Nadeau, filed concurrently herewith and incorporated herein by reference, Plaintiffs respectfully ask the Court to order Defendant Adams (1) to appear for another full day of deposition (both in his corporate and personal capacities) and (2) to answer deposition questions without obstruction. Plaintiffs further request that the Court grant any additional relief it deems appropriate.

In accordance with Federal Rule of Civil Procedure 37(a)(1) and Local Civil Rule 37(E), the undersigned counsel certifies that counsel for Plaintiffs conferred by letter and telephone with attorneys for Defendants PILF and Adams before filing this motion, and that counsel for Plaintiffs made a good faith effort to resolve the discovery matters at issue.

Dated: May 17, 2019

Respectfully submitted,

/s/ Christopher S. Herlihy

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CERTIFICATE OF SERVICE

I, Christopher S. Herlihy, hereby certify that on May 17, 2019, I electronically filed the foregoing Motion to Re-Open the Deposition of Defendant J. Christian Adams using the CM/ECF system, which shall send notification of such filing (NEF) to the following counsel of record:

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